

Message

From: Yarrow, Jon [Jon.Yarrow@astonmartin.com]
Sent: 5/9/2018 5:03:03 PM
To: French, Roberts [french.roberts@epa.gov]
CC: Wiles, Steve [Steve.Wiles@astonmartin.com]; Olechiw, Michael [olechiw.michael@epa.gov]; Ott, William [ott.william@epa.gov]; Gillibrand, Karl [Karl.Gillibrand@astonmartin.com]
Subject: RE: Ex. 4 - CBI and Aston Martin GHG credit transfer
Attachments: ATT00001.txt

Rob

As you have acknowledged in this email Aston Martin has now completed its obligation to balance its GHG debits for the 2013 and 2014 model years.

This now clears the way for the alternative standards to be agreed.

However, I have just completed the CAFE for 2017MY and it now falls to me to complete the end of model year report (noting the new requirements posted by EPA in the last week) and I will be doing this in the shadow of Aston Martin having no alternative standards agreed for the 2017-2019 model year period, this despite the request made in early 2014 and discussed with EPA on many occasions since that time.

So at this point I want to ask again that EPA expedite the federal register publication of the requested standards leading to a final determination that would provide stability for our GHG reporting going forward.

On a separate but very connected note, there is regulatory style wording in the Federal Register describing Alternative Standards that notes:

If the Administrator does not establish alternative standards for an eligible manufacturer prior to 12 months before the first model year to which the alternative standards would apply, the manufacturer may request an extension of the exemption under §86.1801-12(k) or an extension of previously approved alternative standards, whichever may apply.

This could be interpreted thus:

AML could request: that the MY 2012 AML exemption be extended (revived) since EPA did not reach a MY 2015 decision by Jan. 1, 2014 and maintain that the revived exemption must be effective for MY 2015, 2016, 2017, 2018 and 2019 under the "EPA must decide 12 months ahead of time rule".

Is Aston Martin therefore eligible for a total GHG exemption for 2017MY (and by design 2015 and 2016MYs) along with 2018 and 2019 model years as they have, under this wording, also timed out?



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From: French, Roberts [mailto:french.roberts@epa.gov]
Sent: 07 May 2018 14:57
To: Jamie Davies Shawhyde <jamie_davies@ahm.honda.com>

Cc: Yarrow, Jon <Jon.Yarrow@astonmartin.com>; Wiles, Steve <Steve.Wiles@astonmartin.com>; Robert Bienenfeld <Robert_Bienenfeld@ahm.honda.com>; James Kliesch <james_kliesch@ahm.honda.com>; Julie Ortloff <julie_ortloff@ahm.honda.com>

Subject: RE: Honda and **Ex. 4 - CBI** GHG credit transfer

Greetings Jamie et al.,

I confirm that EPA has received notification of this trade and recorded it in our records.

All the best,
Rob

Roberts W. French, Jr.
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From: Jamie Davies [mailto:jamie_davies@ahm.honda.com]
Sent: Friday, May 4, 2018 7:25 PM
To: French, Roberts <french.roberts@epa.gov>
Cc: Yarrow, Jon <Jon.Yarrow@astonmartin.com>; Wiles, Steve <Steve.Wiles@astonmartin.com>; Robert Bienenfeld <Robert_Bienenfeld@ahm.honda.com>; James Kliesch <james_kliesch@ahm.honda.com>; Julie Ortloff <julie_ortloff@ahm.honda.com>
Subject: Honda and **Ex. 4 - CBI** GHG credit transfer

Hi Rob,

Honda and **Ex. 4 - CBI** have entered into an agreement to trade GHG credits. The attached document notes the specific vintages and amounts of credits transferred. To close the loop, could you reply all and acknowledge that EPA has received this document and notification of the trade? As always, please feel free to contact me if you have any questions or concerns.

Best regards,

Jamie Davies
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